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The Fertilizer Institute

Kraig R. Naasz
President

January 29, 2003

U.S. DEPARTMENT OF TRANSPORTATION
03 FEB -6 PM 12:18

RSPA-02-13658-51

Dockets Management System
U.S. Department of Transportation
400 Seventh Street, SW, Room PL 401
Washington, D.C. 20590

RE: Docket Number RSPA – 2002-13658 (HM-215E)

To Whom It May Concern:

The Fertilizer Institute (TFI) appreciates the opportunity to submit comments to the Dec. 3, 2003, *Federal Register* Notice of Proposed Rulemaking (NPRM) on Harmonization with the United National Recommendations, International Maritime Dangerous Goods Code, and International Civil Aviation Organization's Technical Instructions.

TFI is the national trade association of the fertilizer industry, whose members represent the nation's fertilizer producers, manufacturers, retailers, trading firms and equipment manufacturers. Many fertilizer products are regulated as hazardous materials by the U.S. Department of Transportation and, therefore, this NPRM would have a substantial impact on the transportation of fertilizer and fertilizer materials.

Amendments to Sec. 172.101, the Hazardous Materials Table:

TFI and our affected member companies support the streamlining of the entries for ammonium nitrate fertilizer to 3 entries, UN 1942, UN 2071, and UN 2067 as proposed.

Changes to Special Provisions 1B3 and 1P8:

TFI member companies ship ammonia solutions under UN 2672. However, these members do not transport ammonia solutions in Intermediate Bulk Containers (IBC's). Therefore, special provisions 1B3 and 1P8 would not affect TFI member companies.

Proposed Changes to Shipping Papers:

TFI member companies do not support the inclusion of each package type on shipping papers. This is particularly burdensome in the case of shipments of ammonium nitrate fertilizer in non-bulk packaging as a single shipment may be comprised of numerous DOT-authorized non-bulk packaging. In addition, the cost of training employees and revising computer generated shipping papers certainly outweighs any benefit from this proposal.

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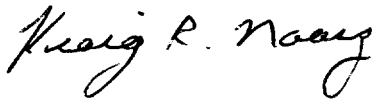
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TFI appreciates the opportunity to comment on this proposal and if you have any questions, please do not hesitate to contact Pam Guffain of my staff at (202) 515-2704.

Sincerely yours,

A handwritten signature in cursive script that reads "Kraig R. Naasz". The signature is fluid and written in dark ink.

Kraig R. Naasz
President